

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
NESSA RISLEY, individually and on behalf of	:	
all others similarly situated,	:	
	:	
Plaintiff,	:	
	:	
v.	:	1:22-cv-02780-KPF
	:	
UNIVERSAL NAVIGATION INC. d/b/a	:	
UNISWAP LABS, HAYDEN Z. ADAMS,	:	
PARADIGM OPERATIONS LP, AH CAPITAL	:	
MANAGEMENT, L.L.C. d/b/a ANDREESSEN	:	
HOROWITZ, and UNION SQUARE	:	
VENTURES, LLC,	:	
	:	
Defendants.	:	
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STIPULATION AND [PROPOSED] ORDER SETTING DEADLINES FOR FILING OF
AMENDED COMPLAINT AND DEFENDANTS' RESPONSE

WHEREAS, on April 4, 2022, Nessa Risley (“Plaintiff”), individually and on behalf of all others similarly situated, filed a class action complaint against Universal Navigation Inc. d/b/a Uniswap Labs, Hayden Z. Adams, Paradigm Operations LP, AH Capital Management, L.L.C. d/b/a Andreessen Horowitz, and Union Square Ventures, LLC (collectively, “Defendants”) in the above-captioned case alleging violations of the Securities Act of 1933 and the Securities Exchange Act of 1934;

WHEREAS, the action is subject to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”);

WHEREAS, the Court previously ordered the parties to confer and submit a proposed schedule for the filing of a consolidated or amended complaint and Defendants’ response thereto

within 15 days after a lead plaintiff has been appointed and lead counsel approved by the Court in accordance with the PSLRA (Dkt. No. 21);

WHEREAS, the Court entered an Order Appointing Lead Plaintiffs and Approving Selection of Co-Lead Counsel on July 29, 2022 (Dkt. No. 40);

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by counsel for the parties listed below, that:

1. Plaintiff shall file an amended complaint on or before September 26, 2022.
2. Defendants shall move or otherwise respond to the amended complaint on or before October 26, 2022.
3. To the extent any Defendant files a pre-motion letter in accordance with Rule 4.A of the Court's Individual Rules of Practice, any responsive correspondence from Lead Plaintiffs shall be filed on or before October 31, 2022.
4. By entering into this stipulation, Defendants do not waive any defenses that otherwise could be asserted through a motion pursuant to Fed. R. Civ. P. 12 or otherwise.

Dated: New York, New York
August 15, 2022

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Attorneys for Lead Plaintiffs

Dated: New York, New York
August 15, 2022

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*Attorneys for Defendants Universal Navigation, Inc.,
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Dated: New York, New York
August 15, 2022

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Dated: New York, New York
August 15, 2022

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Attorneys for Defendant Paradigm Operations LP

SO ORDERED this ____ day of _____, 2022.

THE HONORABLE KATHERINE POLK FAILLA
United States District Judge